



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

N00217.003515  
HUNTERS POINT  
SSIC NO. 5090.3

June 24, 1997

Bill McAvoy [1832.1]  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-5006

RE: Parcel B Preliminary Draft Final Record of Decision dated  
June 3, 1997

Dear Mr. McAvoy:

Thank you for the opportunity to review the Parcel B Preliminary Draft Final Record of Decision (ROD) dated June 3, 1997 before it is made draft final. The document is well written and the majority of our earlier comments were incorporated. However, there are still some comments that must be addressed in the draft final ROD. These comments are provided as an attachment to this letter.

Thank you again for allowing EPA to work with you on finalizing the Parcel B ROD. Please call me with any questions at (415) 744-2409.

Sincerely,

Claire Trombadore  
Remedial Project Manager

cc: Richard Powell, EFAWEST, Code 1832  
Michael McClelland, EFAWEST, Code 62.3  
Chein Kao, DTSC  
Richard Hiett, RWQCB  
Vicky Lang, ORC-3  
Jim Sickles, PRC

attachment

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1997

EPA COMMENTS ON THE PRELIMINARY DRAFT FINAL ROD  
FOR PARCEL B DATED JUNE 3, 1997  
HUNTERS POINT SHIPYARD

- 1) Declaration, page 2, 4th paragraph. Please change the re-evaluation of the groundwater monitoring program from 3 to 5 years. This would give us more time to collect data and it would correspond with the 5 year review. Also, this language would not preclude the Navy from coming to the regulators earlier with a request to re-evaluate the program if they believed it was warranted.

- 2) Declaration, page 2, last paragraph. Please start the paragraph with the following statement: The Navy shall monitor the groundwater to ensure that NAWQC and HGAL, whichever is higher, are not exceeded at the high tide line of the Parcel B tidally influenced zone, which is the point of compliance.

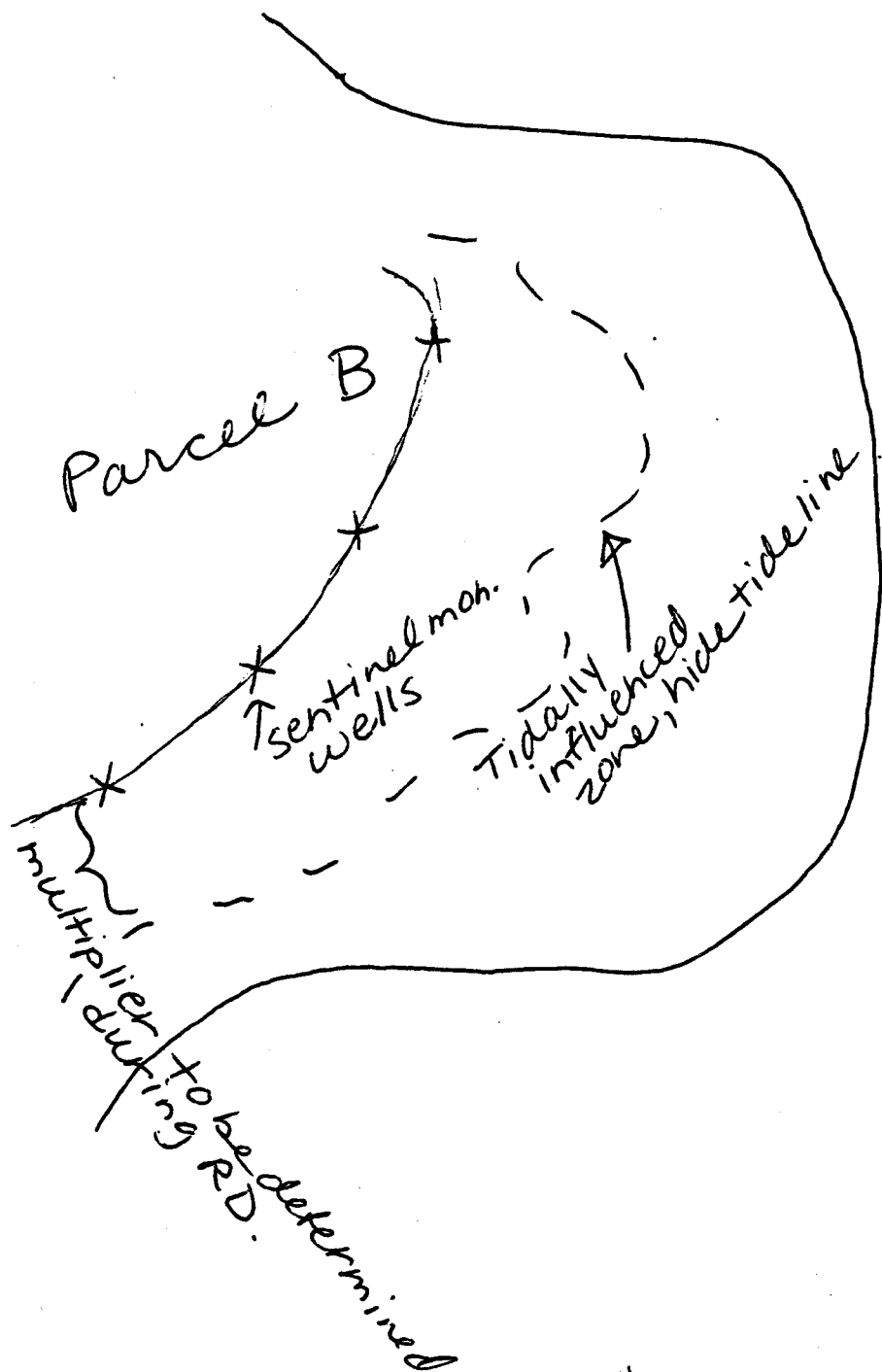
Then the Navy can continue to discuss the multiplier to be calculated etc. EPA would also ask that the Navy give us a bit more background on why 10 times was selected. I understand it is a place holder but also hope some consideration went into selecting 10 as it will be the default number should the modeling be unsuccessful.

- 3) Declaration, page 3. As stated in my April 14, 1997 letter, please add a fifth bullet which states: The FFA shall continue to apply through operation and maintenance of Parcel B response action.
- 4) As requested in my April 14 letter and as you did in the section 2.11 of the ROD, please correct the wording under the statutory determinations portion of the ROD declaration to include the following: The selected remedy does not satisfy the statutory preference for remedies that employ treatment to reduce toxicity, mobility and volume as a principal element. This is due to the numerous comments received during the public comment period in strong opposition to onsite treatment and disposal, the alternative initially proposed by the Navy for Parcel B.... (see comment 1 of my 4-14-97 letter to Marvin Norman.)
- 5) Signature Block. Dan Opalski's block still has an error. It should read as follows:

Daniel Opalski  
Chief  
Federal Facilities Cleanup Branch  
U.S. Environmental Protection Agency Region IX

- 6) Page 10, removal actions. Please add statement that confirmation sampling was performed for the exploratory excavations (EE) and no contamination was left in place. Further state that the EE final report is forthcoming.
- 7) Page 19, third paragraph, 6th sentence. Please add IR-10 to list of sites that may pose a potential threat. IR-10 was listed in an earlier draft and is slated for monitoring in the selected remedy portion of the ROD.
- 8) ARARs. This section of the ROD is good. However, the Navy often states that certain regulations and resolutions, etc "may be" ARARs for Parcel B (e.g. Air regs on page 30, etc.). However, in the ROD the Navy can no longer use "may be". The Navy must state whether or not these regulations/resolutions are ARARs or not.
- 9) Page 48. Under alternative S-2 and any other excavation alternatives, please note that the Navy will be excavating to 10 feet and why.
- 10) Page 53, first full paragraph, forth sentence from the end. After "levels" add: at the tidally influenced zone.
- 11) Page 62, last paragraph. Change wording in second to last sentence to: The Navy shall monitor the groundwater to ensure that NAWQC and HGAL, whichever is higher, are not exceeded at the high tide line of the Parcel B tidally influenced zone, which is the point of compliance.
- 12) Page 64, bullets. As stated in my April 14, 1997 letter, please add a sixth bullet which states: The FFA shall continue to apply through operation and maintenance of Parcel B response action.

Please also create a map/schematic to refer to during the selected remedy section of the ROD. Figure should depict the point of compliance, etc:



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Bay